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June 13, 2007

VIA HAND DELIVERY

Honorable Barbara S. Jones
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 620
New York, New York 10007

Re: United States v. Frank Proscia et al.
S2 06 Cr. 982 (BSJ)

Dear Judge Jones:

As you are aware, we represent Frank Proscia in the above-referenced matter. Mr. Proscia's travel is currently restricted to the District of New Jersey and the Southern and Eastern Districts of New York. We respectfully request that his bail conditions be modified to allow him to travel to Ocean City, Maryland for a family vacation from July 27, 2007, up to and including August 4, 2007.

I spoke to Assistant United States Attorney Lisa Zornberg about this trip and she consents to this bail modification. Thank you for your consideration and if you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Christopher L. Padurano

Christopher L. Padurano

cc: Lisa Zornberg
Assistant United States Attorney (Via Facsimile)
Jeff Steimel
Pretrial Services Officer (Via Facsimile)
Frank Proscia (Via First Class Mail)

Application granted. Defendants' bail conditions are modified to allow him to travel to Ocean City, Md. from July 27, 2007 to August 4, 2007. All other bail conditions remain unchanged.

SO ORDERED

Dated:

6/19/07

**BARBARA S. JONES
U.S.D.J.**

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